REMARKS

Summary Of Office Action

Claims 1-25 and 31-41 were pending in this application. Claims 26-30 were withdrawn pursuant to a restriction requirement.

Independent claims 1 and 14 and dependent claims 2-6 and 13 were rejected under 35 U.S.C. § 103(a) as being obvious from Sheth et al. U.S. Patent No. 6,311,194 (hereinafter "Sheth") in view of Sezan et al. U.S. Patent No. 6,236,395 (hereinafter "Sezan").

Dependent claim 7 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Scott et al. U.S. Patent No. 5,675,752 (hereinafter "Scott").

Dependent claim 8 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Foreman et al. U.S. Patent No. 6,628,303 (hereinafter "Foreman") and Lawler et al. U.S. Patent No. 5,907,323 (hereinafter "Lawler").

Dependent claim 9 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Berhan U.S. Patent No. 6,487,145 (hereinafter "Berhan").

Dependent claim 10 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Reimer et al. U.S. Patent No. 6,065,042 (hereinafter "Reimer").

Dependent claim 11 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Landis U.S. Patent No. 5,659,368

(hereinafter "Landis") and Cane et al. U.S. Patent No. 6,157,931 (hereinafter "Cane").

Dependent claim 12 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Murphy et al. U.S. Patent No. 6,625,810 (hereinafter "Murphy").

Independent claim 15 was rejected under 35 U.S.C. § 103(a) as being obvious from Rose et al. U.S. Patent No. 5,752,244 (hereinafter "Rose") in view of Montgomery et al. U.S. Patent No. 6,380,950 (hereinafter "Montgomery") and Hendricks et al. U.S. Patent No. 5,659,350 (hereinafter "Hendricks").

Independent claim 16 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Montgomery and Hendricks.

Independent claim 17 and dependent claim 19 were rejected under 35 U.S.C. § 103(a) as being obvious from Tjaden U.S. Patent No. 6,122,617 (hereinafter "Tjaden") in view of May et al. U.S. Patent No. 5,544,354 (hereinafter "May").

Dependent claim 18 was rejected under 35 U.S.C. § 103(a) as being obvious from Tjaden in view of May and further in view of Parnian et al. U.S. Patent No. 6,538,623 (hereinafter "Parnian").

Dependent claim 20 was rejected under 35 U.S.C. § 103(a) as being obvious from Tjaden in view of May and further in view of Gruse et al. U.S. Patent No. 6,389,538 (hereinafter "Gruse").

Independent claim 21 was rejected under 35 U.S.C. § 103(a) as being obvious from May in view of Fatseas et al. U.S. Patent No. 5,671,409 (hereinafter "Fatseas").

Independent claim 22 was rejected under 35 U.S.C. § 103(a) as being obvious from May in view of Fatseas and further in view of Hendricks.

Independent claims 23 and 24 were rejected under 35 U.S.C. § 103(a) as being obvious from Sezan in view of Hsu et al. U.S. Patent No. 6,377,956 (hereinafter "Hsu").

Independent claim 25 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Gordon et al. U.S. Patent No. 6,584,153 (hereinafter "Gordon") and Hsu.

Dependent claims 31, 32, 37, and 40 were rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Rabne et al. U.S. Patent No. 6,006,332 (hereinafter "Rabne").

Dependent claims 33 and 34 were rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Rabne and Rivera et al. U.S. Patent No. 6,056,786 (hereinafter "Rivera").

Dependent claim 35 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Rabne and Rose.

Dependent claim 36 was rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Rabne and Hurtado et al. U.S. Patent No. 6,418,421 (hereinafter "Hurtado").

And dependent claims 38, 39, and 41 were rejected under 35 U.S.C. § 103(a) as being obvious from Sheth in view of Sezan and further in view of Rose.

Summary Of Applicants' Reply

Applicants have canceled claims 17-22 without prejudice. Thus, the rejections of those claims are rendered moot.

No new matter has been added.

Reconsideration of this application in view of the following remarks is respectfully requested.

The Rejections of Claims 1-14 and 31-41 Under 35 U.S.C. § 103(a)

Independent claims 1 and 14 were rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Sheth and Sezan. Dependent claims 2-13 and 31-41 were rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Sheth and Sezan and one or more of the other cited references.

Regarding independent claim 1, the Examiner said that "Sheth teaches the claimed limitation 'metadata for at least two types of digital assets selected from the group consisting of movies and text documents.'" The Examiner cited Sheth FIGS. 1-6 and 11 and column 8, lines 20-45.

The Examiner also said that although "Sheth does not explicitly teach the claimed limitation 'audio recordings, video recordings[,]' Sezan teaches attribute voice-annotation for audio and color profile for video." The Examiner cited Sezan column 29, lines 20-35, and column 19, lines 35-45.

The Examiner concluded that it would have been obvious to a person of ordinary skill in the art at the time of the invention to apply the teachings of Sezan to Sheth's system.

Regarding independent claim 14, the Examiner said substantially the same thing.

These rejections are respectfully traversed.

Independent claims 1 and 14 define "A document type definition (DTD). "A DTD is a separate file or document that contains formal definitions of all the data elements in a

particular type of XML (or HTML or SGML) document" (applicants' specification, page 13, lines 19-22). An example of a DTD in accordance with applicants' invention is shown in applicants' specification on pages 16-24: Example 1 shows a single DTD that includes definitions pertaining to movies, photographs, audio, and rights management.

In contrast, Sheth purportedly discloses "a system and method for creating a database of metadata" (Sheth column 4, lines 54-55, and abstract, line 1). An aspect of Sheth is "its ability to acquire metadata content from many sources" (column 9, lines 61-62).

Sheth's FIG. 6, cited by the Examiner, shows "a sample of a [sic] XML-based definition of an asset" (column 6, lines 8-9; emphasis added). That is, FIG. 6 shows an XML document for a single type of media created by an "extractor" (*see* column 11, lines 11-56). An extractor uses extraction rules (*id.* at line 42) that "list the metadata attributes for the [i.e., the single] type of media that [a Web] site contains" (*id.* at lines 43-45; emphasis added). Thus, Sheth's FIG. 6 contains actual data values encoded in XML about a video, and not a DTD encoded in XML containing definitions of data elements pertaining to various types of digital assets (as defined by applicants' claim 2). Accordingly, Sheth's FIG. 6 does not show applicants' invention.

Therefore, although Sheth discusses metadata for digital assets, Sheth does not in any way teach or suggest a DTD that includes metadata for two or more types of digital assets.

Sezan purportedly discloses various description schemes including a program description scheme that "provides information regarding the associated program" (Sezan column 1, lines 59-60). Although Sezan mentions meta information for a

video or audio program, it does so in the context of a single video or audio program, not a collection of digital asset types: "Referring to FIG. 15, the meta information description scheme 408 generally includes various descriptors which carry general information about a [i.e., a single] video (or audio) program" (Sezan, column 27, lines 7-9; emphasis added).

Sezan also purportedly discloses a system description scheme that "manages the individual programs and other data. The management may include maintaining lists of programs, categories, channels, users, videos, audio, and images" (column 6, lines 23-26; emphasis added). These lists are not shown or described further and there is no suggestion whatsoever that these lists are DTDs.

Furthermore, Sezan does not in any way teach or suggest a DTD that includes metadata for two or more types of digital assets.

In sum, neither Sheth nor Sezan shows or suggests a DTD, much less a DTD as defined in applicants' independent claims 1 and 14.

Thus, the combination of Sheth and Sezan does not result in applicants' invention. Accordingly, applicants' invention as defined in independent claims 1 and 14 is not rendered obvious from the combination of Sheth and Sezan.

For at least the reasons discussed above with respect to independent claim 1, dependent claims 2-13 and 31-41, which depend either directly or indirectly from claim 1, are not obvious from the combination of Sheth and Sezan and any other cited reference (i.e., dependent claims are patentable if their independent claim is patentable).

Accordingly, applicants respectfully request that the rejections of claims 1-14 and 31-41 under 35 U.S.C. § 103(a) be withdrawn.

The Rejection of Independent Claim 15 Under 35 U.S.C. § 103(a)

Independent claim 15 was rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Rose, Montgomery, and Hendricks. The Examiner said that Rose teaches the claim limitation of metadata for photographic digital assets and audio digital assets, but does not explicitly teach promo digital assets and voiceover digital assets. The Examiner also said that Montgomery teaches voiceovers and that Hendricks teaches promo digital assets. The Examiner concluded that it would have been obvious to a person of ordinary skill in the art at the time of the invention to apply the teachings of Montgomery and Hendricks to Rose's system.

This rejection is respectfully traversed.

Rose is directed to "computerized management of multimedia assets" (Rose column 1, lines 7-8) and shows in its FIG. 3 "a block diagram of a database structure" (*id.* at column 2, line 66). "The database is structured around ... asset tables 86 for each asset type" (*id.* at column 5, lines 15-17). Rose does not in any way teach or suggest DTDs, much less DTDs as defined in applicants' claim 15.

Montgomery is directed to "production in a personal computer environment of low bandwidth images and audio" (Montgomery column 3, lines 8-10). Montgomery also does not in any way teach or suggest DTDs, much less DTDs as defined in applicants' claim 15.

Hendricks is directed to "a center for controlling the operations of a digital television program delivery

system" (Hendricks column 3, lines 5-6). Hendricks also does not in any way teach or suggest DTDs, much less DTDs as defined in applicants' claim 15.

Therefore, because neither Rose, Montgomery, nor Hendricks teaches or suggests DTDs in any way, the combination of Rose, Montgomery, and Hendricks does not result in applicants' invention as defined in claim 15. Thus, the invention of claim 15 is not rendered obvious from the combination of Rose, Montgomery, and Hendricks.

Accordingly, applicants respectfully request that the rejection of claim 15 under 35 U.S.C. § 103(a) be withdrawn.

The Rejection of Independent Claim 16 Under 35 U.S.C. § 103(a)

Independent claim 16 was rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Sheth, Montgomery, and Hendricks. The Examiner said that Sheth teaches the claimed limitations "digital content ..." and "metadata for at least three types of digital assets ...." The Examiner also said that Montgomery teaches voiceovers and that Hendricks teaches audio/video and storing audio track to promos in a database. The Examiner concluded that it would have been obvious to a person of ordinary skill in the art at the time of the invention to apply the teachings of Montgomery and Hendricks to Sheth's system.

This rejection is respectfully traversed.

As discussed above, neither Sheth, Montgomery, nor Hendricks teaches or suggests DTDs in any way. Therefore, the combination of Sheth, Montgomery, and Hendricks does not result in applicants' invention as defined in claim 16, and thus the invention of claim 16 is not rendered obvious from the combination of Sheth, Montgomery, and Hendricks.

Accordingly, applicants respectfully request that the rejection of claim 16 under 35 U.S.C. § 103(a) be withdrawn.

The Rejections of Independent Claims 23 and 24 Under 35 U.S.C. § 103(a)

Independent claims 23 and 24 were rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Sezan and Hsu. The Examiner said that Hsu "teaches DTD definition for multimedia file including video and audio," and cited Hsu column 7, lines 35-65.

These rejections are respectfully traversed.

Claims 23 and 24 both define digital asset libraries comprising, among other things, "a document type definition (DTD) comprising definitions for" several types of digital assets.

As discussed above, Sezan does not in any way teach or suggest a DTD.

Hsu is directed to a "system for automatically assembling product manuals" (Hsu column 2, line 6). While Hsu mentions DTDs (column 7, lines 35-38), Hsu does not teach or suggest a single DTD comprising definitions for multiple types of digital assets.

Therefore, the combination of Sezan and Hsu does not result in applicants' invention as defined in claims 23 and 24. Thus, claims 23 and 24 are not rendered obvious from the combination of Sezan and Hsu.

Accordingly, applicants respectfully request that the rejections of claims 23 and 24 under 35 U.S.C. § 103(a) be withdrawn.

The Rejection of Independent Claim 25 Under 35 U.S.C. § 103(a)

Independent claim 25 was rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Sheth, Gordon, and Hsu. The Examiner said that Gordon "teaches storing audio, video, voice-over and promos," and cited Gordon column 19, lines 60-67, column 18, lines 30-35, and column 14, lines 5-10.

This rejection is respectfully traversed.

Claim 25 defines a digital asset library comprising, among other things, "a document type definition (DTD) comprising definitions for ... at least two types of digital assets."

As discussed above, Sheth does not in any way teach or suggest a DTD, and Hsu does not teach or suggest a DTD comprising definitions for multiple types of digital assets.

Gordon is directed to "a data structure suited to efficiently representing [sic] a plurality of image streams" (Gordon column 2, lines 33-34). "A data structure according to the invention comprises: a multiplexed stream comprising a plurality of video streams" (*id.* at lines 48-49). These data structures are not DTDs. Moreover, Gordon does not in any way teach or suggest a DTD that comprises definitions for at least two types of digital assets.

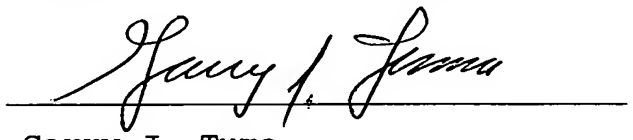
Therefore, the combination of Sheth, Gordon, and Hsu does not result in applicants' invention as defined in claim 25. Thus, claim 25 is not rendered obvious from that combination.

Accordingly, applicants respectfully request that the rejection of claim 25 under 35 U.S.C. § 103(a) be withdrawn.

Conclusion

The foregoing demonstrates that claims 1-16, 23-25, and 31-41 are allowable. This application is therefore in condition for allowance (subject to cancellation of withdrawn claims 26-30). Reconsideration and allowance are accordingly respectfully requested.

Respectfully submitted,



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